

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

Barry D. Leiwant
*Interim Executive Director
and Attorney-in-Chief*

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

February 27, 2024

BY ECF

The Honorable Judge Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Alex Stroman
23 Cr. 7 (GHW)

Honorable Judge Woods:

I write to respectfully request that the Court expedite the Presentence Report in the above captioned matter. United States Probation Officer Katherine Wysoczanski advises that an expedited Presentence Report can be completed in this matter by March 29, 2024, if the Defense and Government agree to one disclosure. The defense agrees to an expedited process with a single disclosure. The Government similarly does not object to an expedited pre-sentence process with a single disclosure.

An expedited Presentence Report would allow the Court to conduct Alex Stroman's sentencing hearing at an earlier date. Currently, Mr. Stroman is scheduled for sentencing on May 15, 2024. He awaits sentencing at the Metropolitan Detention Center of Brooklyn (MDC) following his remand pending sentencing on February 15, 2024. By expediting sentencing, the defense hopes to minimize the time that Alex Stroman spends in the harsh, isolating environment of the MDC.

With an expected disclosure date of March 29, 2024, the defense requests an earlier sentencing date and is available April 8-9, April 18, and any day the week of April 22.¹

¹ Defense counsel is out of the country and unavailable April 10-17.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Zawadi Baharanyi

Zawadi Baharanyi
Assistant Federal Defender

(212) 417-8735/ (917) 612-2753

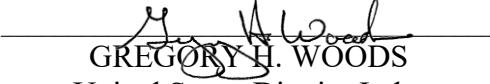
cc: Jerry Fang, Assistant U.S. Attorney.

Application granted. The sentencing hearing scheduled in this matter for May 15, 2024 is rescheduled to April 18, 2024 at 11:00 a.m. The defendant's sentencing submissions are due no later than April 4, 2024; the Government's sentencing submissions are due no later than April 11, 2024.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 85.

SO ORDERED.

Dated: February 28, 2024
New York, New York


GREGORY H. WOODS
United States District Judge